

IN THE IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION

DARLINGTON AMADASU	§	
<i>Plaintiff,</i>	§	
	§	
v.	§	
	§	CASE No. C-1-01-210
JAMES R. DONOVAN, M.D,	§	
UNIVERSITY OF CINCINNATI,	§	
CLAUDIA S. MILLER, M.D., ROGER	§	
PERALES AND UNIVERSITY OF TEXAS	§	
HEALTH SCIENCE CENTER AT SAN	§	
ANTONIO,	§	
<i>Defendants.</i>	§	

AFFIDAVIT OF ROGER PERALES

STATE OF TEXAS §
COUNTY OF BEXAR §

BEFORE ME, the undersigned notary public, personally appeared ROGER PERALES, known to me to be the person whose name is subscribed below, who on his oath, stated and deposed as follows:

"I, Roger Perales, am of sound mind, am over the age of 18, and am fully competent and qualified to make this Affidavit. All of the facts set forth below are true and correct and are known to me pursuant to my own personal knowledge.


At all times relevant to this lawsuit, I was enrolled part-time at the University of Texas Houston School of Public Health at the San Antonio Campus and was employed as an Environmental Medical Training Coordinator by the University of Texas Health Science Center



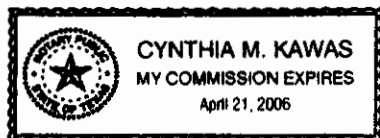
in the South Texas Environmental Education and Research (STEER) program in Laredo, Texas. I have met the Plaintiff in this case, Darlington Amadasu, and I am familiar with the claims he has made against me.

Mr. Amadasu has never been an employee of mine. While participating in the program, Mr. Amadasu received free housing from the Mid Rio Grande Border Office of the Area Health Education Center. I did not discriminate against Mr. Amadasu in any way while he was a participant in the STEER program. Further, I did not violate any rights, statutory or constitutional, of Mr. Amadasu during his participation in the STEER program. Ultimately, Mr. Amadasu was released from the STEER program because of his inappropriate behavior. Mr. Amadasu's claims against me are baseless.

Further the Affiant sayeth not."



SWORN TO and SUBSCRIBED before me on the 16 day of March, 2005.


Notary Public, State of Texas

My commission expires:

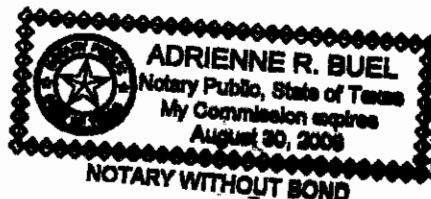
with the allegations he has made against the Texas Defendants.

Mr. Amadasu applied for a month-long rotation in the STEER program. Such rotation was to last for approximately four weeks during April of 2000. Mr. Amadasu has never been an employee of mine, UTHSC, or the STEER program. During his participation in the program, Mr. Amadasu did not receive medical benefits or any of the benefits usually associated with employment by a state entity. Further, during his participation in the program, Mr. Amadasu was not enrolled as a student at UTHSC. While participating in the program, Mr. Amadasu received free housing from the Mid Rio Grande Border Office of the Area Health Education Center - he neither rented nor purchased housing from me, UTHSC, or the STEER program. Neither myself nor UTHSC discriminated in any way against Mr. Amadasu while he was a participant in the STEER program. Further, neither myself nor UTHSC violated any rights, statutory or constitutional, of Mr. Amadasu during his participation in the STEER program. Ultimately, Mr. Amadasu was released from the STEER program because of his inappropriate behavior. Mr. Amadasu's claims against me and UTHSC are baseless.

Further the Affiant sayeth not."



SWORN TO and SUBSCRIBED before me on the 25 day of March, 2005.



Adrienne R. Buel
Notary Public, State of Texas